

AFFIDAVIT OF SPECIAL AGENT CANDICE M. FOLEY
IN SUPPORT OF CRIMINAL COMPLAINT

I, Candice M. Foley, state:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Department of Homeland Security United States Immigration and Customs Enforcement Homeland Security Investigations (HSI) assigned to the Boston Field Office, and have been employed by HSI since 2007. During my law enforcement career, I have participated in investigations targeting the smuggling, trafficking, and distribution of controlled substances. As part of my employment with HSI, I successfully completed the Federal Law Enforcement Training Center's Criminal Investigator Training Program and the Immigration and Customs Enforcement Basic School, both of which included intensive instruction with regard to law enforcement, including the process of seeking applications for, and executing search and arrest warrants, and other legal process. In addition to my training, I have participated in the preparation and/or execution of numerous search warrants and arrests of individuals who were involved in criminal activities. I have also participated in the debriefing of defendants, informants, and witnesses who had personal knowledge about criminal activities and the operation of criminal organizations, including drug-trafficking organizations. In connection with my official duties, I have investigated and assisted other agents in investigating numerous cases involving a wide variety of criminal violations including, but not limited to, fraud, drug trafficking, and intellectual property rights violations.

2. I have written and/or participated in the execution of numerous search warrants resulting in the seizure of large quantities of controlled substances and paraphernalia involved in the manufacture and distribution of controlled substances; United States currency, records of drug and monetary transactions, drug customer lists and other documents relating to the

manufacturing, transportation, ordering, purchasing and distribution of controlled substances, as well as the collection, expenditure, accounting, transportation, and laundering of drug proceeds. I have participated in all aspects of drug investigations including conducting surveillance, executing searches pursuant to court-ordered search warrants, executing arrests, and participating in court-authorized Title III wiretaps of cellular phones. I have received extensive specialized training in the field of controlled substance identification, investigation and enforcement. In my training and experience, and based on the facts of this particular investigation, the trafficking of counterfeit steroid drugs is substantially similar to the trafficking of other types of illegal drugs.

3. I am currently investigating a group of individuals involved in selling, manufacturing, and distributing counterfeit steroid drugs, in violation of 18 U.S.C. § 371 (Conspiracy); 18 U.S.C. § 545 (Smuggling Goods Into the United States); 18 U.S.C. § 1341 (Mail Fraud); 18 U.S.C. § 1343 (Wire Fraud); 18 U.S.C. § 1956, 1957 (Money Laundering Offenses); 18 U.S.C. § 2320 (Trafficking in Counterfeit Goods and Services); 21 U.S.C. §§ 331(i)(3) and 333(a)(2) (Sale, Dispensing, and Hold for Sale and Dispensing Counterfeit Drugs); 21 U.S.C. §§ 331(a) and 333(a)(2) (Introduction or Delivery for Introduction Into Interstate Commerce of a Misbranded Drug); 21 U.S.C. 353(b)(1) (Unlawful Dispensing Prescription Drugs—Misbranding); 21 U.S.C. 841 (Distribution of Controlled Substances); and 21 U.S.C. § 846 (Conspiracy To Distribute Controlled Substances).

PURPOSE OF AFFIDAVIT

4. This affidavit is being submitted in support of a criminal complaint against the following individuals:

- A. Tyler **Bauman**, a/k/a Tyler Baumann, a/k/a “musclehead 320”;
- B. Kathryn **Green** a/k/a Katie Green, a/k/a Katy Green;

- C. Philip **Goodwin**;
- D. Robert **Medeiros**;
- E. Brian **Petzke**; and
- F. Melissa **Sclafani**

charging that beginning at least in or about May 2015 and continuing until the present, each did:

- (1) knowingly and willfully conspire with each other and others known and unknown to commit offenses against the United States, to wit, to intentionally traffic and attempt to traffic in consumer goods—pharmaceuticals—and to knowingly use counterfeit marks—specifically the Onyx logo and Onyx word mark—on and in connection with such goods, which counterfeit marks were identical to and substantially indistinguishable from genuine marks, and the use of such marks was likely to cause confusion, to cause mistake, and to deceive, in violation of 18 U.S.C. § 2320, all in violation of 18 U.S.C. § 371; and
- (2) knowingly and intentionally combine, conspire, confederate, and agree with others known and unknown, to possess with intent to distribute and to distribute counterfeit testosterone, trenbolone, and other steroid compounds that are Schedule III controlled substances, in violation of 21 U.S.C. §§ 841(a)(1), 841(a)(2), and 846.

5. This affidavit sets forth probable cause in support of applications for search warrants for the following locations:

- A. [REDACTED], Shrewsbury, MA (the “Bauman/Green Residence”);
- B. [REDACTED], [REDACTED] Gardner, MA (the “Medeiros Residence”);
- C. [REDACTED], Lynn, MA (the “Goodwin Residence”);

D. [REDACTED], Gloucester, MA (the “Sclafini Residence”); and

E. [REDACTED], MA (the “Petzke Residence”) for a cellular phone.

These locations are referred to herein collectively as the “Target Locations.” A separate affidavit will incorporate this affidavit by reference and will set forth additional facts in support of searches of these Target Locations.

6. This affidavit does not set forth all the facts developed during the course of this investigation. Rather, it sets forth only those facts that are necessary and sufficient to establish probable cause to believe that the defendants identified herein have committed and will continue to commit the above-described offenses, and that evidence, fruits, and instrumentalities of these offenses will be found in the above-described target locations. There is probable cause to believe that the Target Locations contains fruits, evidence, and instrumentalities of the crimes listed in paragraph 3.

7. I have participated in the below-described investigation since March 2016. I am familiar with the facts and circumstances of this investigation based on information I have received from a variety of sources, including my own personal participation in the investigation, oral and written reports made to me by other law enforcement officers, physical surveillance, public records, business records, telephone toll records, documents obtained pursuant to search warrants for email and social media accounts, and court-authorized GPS tracking and cell-phone location tracking.

BACKGROUND REGARDING TRAFFICKING IN COUNTERFEIT DRUGS

8. The criminal counterfeit marks statute, 18 U.S.C. § 2320, is designed to protect trademarks from infringement. A trademark is “any word, name, symbol, or design, or any combination thereof . . . used by a person . . . to identify and distinguish his or her goods . . .

from those manufactured or sold by others and to indicate the source of the goods.” 15 U.S.C.

§ 1127. The criminalization of trademark counterfeiting statutes is designed to address a number of concerns including protecting a mark-holder’s intellectual property from theft or dilution and protecting consumers from fraud. HSI and the Department of Justice are especially concerned with counterfeit products that implicate a public health and safety concern, such as counterfeit military supply parts, counterfeit safety devices (e.g., air bags), and counterfeit drugs. A counterfeit drug is defined as any drug that “uses a counterfeit mark on or in connection with the drug.” 18 U.S.C. § 2320(f)(6).

9. During this investigation, I and other agents (with the assistance of private investigators), directly observed violations of criminal counterfeiting laws, including improper usage of trademarks owned by Amgen, Inc., a biopharmaceutical company based in California. These trademarks are currently registered and in-use by Amgen (through its subsidiary Onyx Pharmaceuticals), and the counterfeit marks were identical to or indistinguishable from the genuine marks. Both the name and the logo used by Onyx Pharmaceuticals are trademarked, and use of an identical or substantially indistinguishable mark in connection with the sale of any goods is a potential violation of 18 U.S.C. § 2320.

10. In addition, there are specific prohibitions in the Federal Food, Drug, and Cosmetic Act regarding the adulteration or misbranding of any drug in interstate commerce. 21 U.S.C. §§ 331(a), 331(i)(3), and 333(a)(2). During the course of my investigation, I and other agents directly observed the misbranding of drugs in interstate commerce, as we observed the advertisements of steroid drugs on the internet that were marked as being a product of Onyx Pharmaceuticals, when Onyx does not manufacture or sell the steroid drugs being advertised.

Dispensing a prescription drug without the prescription of a licensed practitioner also constitutes “misbranding” Federal Food, Drug, and Cosmetic Act. 21 U.S.C. § 353(b)(1).

SUMMARY OF EVIDENCE

I. Background of the Investigation

11. On May 29, 2015, Amgen became aware of a potential counterfeiting problem regarding trademarks used by its subsidiary, Onyx Pharmaceuticals. Specifically, Onyx reported receiving an email inquiry requesting product verification that included several photographs showing a package and vials displaying the name “Onyx Pharmaceuticals” and a logo indistinguishable from the Onyx logo. The vials appeared to be liquid vials of injectable steroid drugs, including the hormone testosterone. Onyx does not manufacture or market testosterone or other steroid products. On November 30, 2015, Amgen informed HSI of their concerns regarding a potential counterfeiting problem.

12. Anabolic steroids, including testosterone, can be obtained via a prescription and have a variety of medical uses. Some individuals, including athletes and bodybuilders, use steroids for cosmetic purposes, such as to enhance muscle development and performance, and to recover from injury. There are a variety of laws in the United States that control the use, manufacture, and possession of anabolic steroids.

13. Based on my training and experience, I am aware that there is a belief among some users of steroid drugs that there are steroid products that are legally available for purchase in other countries that can be shipped into the United States. I have observed online discussions regarding methods of obtaining steroids which are illegal in the United States for cosmetic use. Due to the variation in laws in different countries, it appears that some steroid users believe they

can obtain safe and effective steroid drugs manufactured overseas by reputable biopharmaceutical companies who are prevented from selling their products in the United States.

14. As described below, during the course of the investigation, we ultimately obtained samples of liquid steroids being sold with “Onyx” labels. These products were sent to Amgen, who confirmed that the products bore a number of counterfeit marks.

15. Although Onyx does not make anabolic steroid products either in the United States or elsewhere, based on my training and experience, I believe that the Onyx Pharmaceutical name and logo is being used in connection with the sale of these products as a means to assure buyers that the products are safe and effective.

16. I also believe that there is a misperception by some members in the community of users that these products have been manufactured by Onyx overseas for intended resale in the foreign market. I believe other users know that the steroids are manufactured here in the United States, but are under the impression based on the packaging, labeling, and other use of the Onyx name, that the products are safer and more effective than a generic or unlabeled steroid.

II. Overview of the Scheme

17. The purported “Onyx” pharmaceuticals have been directly advertised online through social media, specifically the social media platform “Instagram.” Two of the Instagram accounts used to market the product used the Instagram vanity names “onyx_roid” and “onyxpharma.”¹ These advertisements themselves explicitly make use of the Onyx trademarks, as depicted below in this posting from the onyx_roid account on May 2, 2015.

¹ Both of these accounts were active for a relatively short period of time before Instagram shut them down, due to the sale of drugs on the platform. However, the contents of the accounts were later retrieved through search warrants, and the postings illustrate the manner in which the



18. The discussion and images posted on Instagram are clearly evidence of the selling of counterfeit Onyx liquid steroids. For instance, the below picture was posted from the onyxpharma Instagram Account on July 11, 2015, and appeared together with the accompanying text:

products were advertised on social media through these and other accounts. Currently, the conspiracy is using a private Instagram account, “onyx_clothing_gains” to market the products.



Text Weekend sale thru sunday 7/12 Buy 3 get 1 free \$60 per vial. No minimum Email onyxpharma2015@gmail.com to order #gainz #bodybuilder #bodybuilding [] #steroids #npc #ifbb #aesthetic #shredded #bulking #anavar #anadrol #dbol #fitness #gym #trenharder #3cc #steroids #buysteroids #onyx #onyxpharma #5percenters

19. The Instagram accounts included postings that directed users to send an email to either “onyxsales2015@gmail.com” (on the onyx_roid Instagram account) or “onyxpharma2015@gmail.com” (on the onyxpharma Instagram account) for a listing of products and prices, and to place orders. For instance, in the text of the onyxpharma Instagram post above, customers are instructed to email “onyxpharma2015@gmail.com” to order. Similarly, the image of an onyx_roid Instagram post contained the following instructions:

ALL OF YOU WHO ARE
CONFUSED IF YOU WANT TO
MAKE AN ORDER JUST EMAIL
ONYXSALES2015@GMAIL.COM
JUST SAY WHAT YOU WANT I
WILL SEND YOU A NAME AND
PLACE TO SEND FUNDS WITH
THE PRICE OF YOUR
ORDER .JUST CAUSE YOU GET
AN AUTO REPLY DOES NOT
MEAN I WONT GET YOUR
EMAIL BE PATIENT.

20. Customers that email “onyxsales2015@gmail.com” or “onyxpharma2015@gmail.com” (both of which remain active) receive an automatic reply with a list of prices and instructions (see Exhibit 1 for an example of the auto-reply message). Further email exchanges then come from the email account “bigdick.bd723@gmail.com” (the “Big Dick Account”). While the Instagram accounts have changed, due to the monitoring and closing of the accounts by Facebook/Instagram, the email addresses used by the conspiracy have remained relatively constant: the current Instagram account still directs customers to “onyxsales2015@gmail.com.”

21. When customers place orders, they are instructed to pay via MoneyGram or Western Union. For instance, on May 2, 2015, the onyx_roid Instagram account posted the below image, and captioned it “Excepted [sic] forms of payment.”



22. When customers pay by Western Union, they are instructed to send the money to a specific name (an alias) in Massachusetts. At times, in order to circumvent any applicable identification requirement when the funds are picked up, the customer is instructed to provide Western Union with a challenge question and answer for the money recipient to provide at the time of pickup. The names provided to customers are aliases created by members of the conspiracy to obtain funds while attempting to avoid detection by law enforcement.

23. In a further effort to evade law enforcement, customers are explicitly told not to send payment by Pay Pal. For example, on June 26, 2015, in a direct message with a customer on the onyx_roid Instagram account, the customer was told “pay pal is paper trial.anyone [sic] selling steroids inside usa excepting [sic] pay pal is an idiot.” Emails to customers from the Big Dick Account have expressed a similar concern about using PayPal or other payment forms that might, in the seller’s view, lead to law enforcement detection. For example, when one customer complained that Western Union was more expensive than other payment services and requested that the seller accept PayPal, the seller responded: “Yea so i can have a account that putd a paper

trail and a cop can find out who its linked to real smart.this process insnt default everyone does it fine allday. Noone has issues maybe if you follow directions you wouldnt either.”²

24. In addition to arranging for payment, the customer also provides a shipping address, and once payment is arranged the customer is provided with a United States Postal Services (USPS) tracking number for their purchase.

25. The steroids are made by one or more members of the conspiracy, using raw materials and supplies obtained internationally and domestically.

26. The steroids are shipped to customers by multiple members of the conspiracy. In an attempt to avoid detection by law enforcement, the members of the conspiracy make shipments from multiple locations and use fictitious return addresses.

27. Emails obtained from the Big Dick Account, which is run from the Bauman/Green Residence, illustrate that the illegal steroid operation is a high volume enterprise catering both to individual users and bulk purchaser/resellers and has been functioning for a considerable period of time. For example, in an email from September 12, 2015, the seller responded to a customer complaint about the quality of the trenbolone steroid he purchased: “Tren is are number 1 seller.we test all our powders before we make them.then we make them all at once. We get great feed back on our tren the thing is if there was a problem with your bottles we would get lots of complaints we make 5000 bottles at once. . . . i myself make it so i know its done correct. I have been making it for 20 years.has to be sometning else not the drug bro.”

² Throughout this affidavit, spelling, grammatical, and typographical errors in the co-conspirators written communications are as they appear in the original communications.

28. When another customer complained in February 2016 that the vials of steroids he received were “like 2 ccs short” (i.e., did not contain the full amount of steroids he purchased), the Big Dick Account responded: “The machine must be getting jamed or something. They go down a machine in a line and machine squarts it into each bottle i will check that out.”

29. This type of mass production and distribution generates significant cash proceeds. As stated in a July 2015 email from the Big Dick Account, “we fill about 15k in orders a day.” In short, the emails obtained from the Big Dick Account, coupled with other evidence in this investigation, establish that the targets are involved in a significant operation that manufactures bulk quantities of counterfeit steroids and distributes these products to users and resellers throughout the country.

III. Overview of the Individuals and the Target Locations

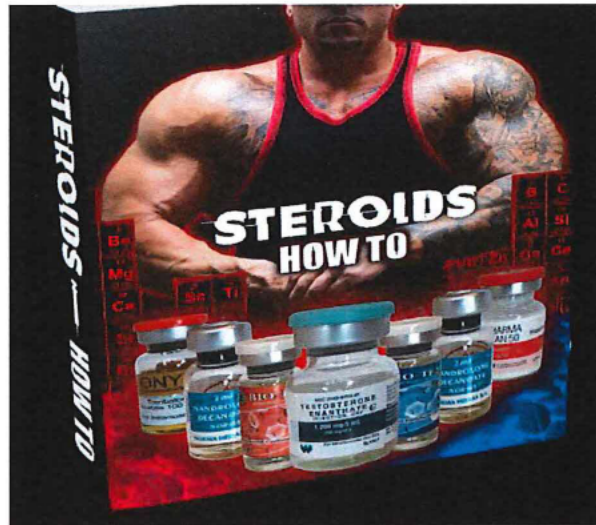
30. Tyler Bauman and Kathryn Green are an engaged couple who live with their family at [REDACTED], Shrewsbury, MA (the “Bauman/Green Residence”). Bauman and Green are primarily involved in the online sales and coordination aspects of the conspiracy. The Big Dick Account is primarily run from their home. Bauman has multiple felony convictions, including distribution of a class B controlled substance in 2011, cocaine trafficking in 2005 (for which he received a 5-7 year sentence), assault and battery, and assault and battery on a police officer.

31. Bauman maintains a public persona across a number of social media platforms including Instagram, using derivations of the vanity name “Musclehead 320.”³ Bauman is a

³ For instance, Bauman has used Instagram accounts under “Musclehead320” and “Musclehead320_”, appears on Twitter as @musclehead320, is on Snapchat as “musclehead.life” and posts videos on YouTube as “muscle head.”

body builder, and openly discusses his use of steroids, including purported Onyx injectable steroids. Green also occasionally appears in the Musclehead 320 social media postings, featuring her own fitness and bodybuilding activities. Bauman claims, in his postings under the “Musclehead 320” persona, that he is “sponsored” by Onyx. He does not reveal that he is involved in manufacturing and selling the product.

32. Using the Musclehead 320 persona, Bauman sells an e-book “Steroids – How To” on his social media platforms. As depicted below, the cover of the book shows an image of an “Onyx” injectable steroid and a photo of Bauman from the nose down. As discussed above, this bottle of “Onyx” steroids is definitively counterfeit, as Onyx does not manufacture anabolic steroids.



33. Phillip Goodwin resides at [REDACTED], Lynn, MA (the “Goodwin Residence”). He is involved in the creation/assembly of the counterfeit steroids.

34. Robert Medeiros resides at [REDACTED], Gardner, MA (the “Medeiros Residence”). He is one of the primary shippers of the finished counterfeit steroids to customers.

35. Brian Petzke resides at [REDACTED], Saugus, MA. He is involved in obtaining raw materials for the steroids, primarily via international packages. He also shipped counterfeit steroids to customers.

36. Melissa Sclafani and her husband Joseph Sclafani reside at [REDACTED], Gloucester, MA (the “Sclafani Residence”). They are involved in obtaining raw materials/supplies for the steroids, both internationally and domestically.

37. Bauman, Goodwin, and Melissa Sclafani are the co-owners/purported operators of a tanning salon, Wicked Tan, at 138 Dodge St., in Beverly, Massachusetts. The tanning salon business is believed to be used by members to the conspiracy to pass funds to each other and to otherwise launder proceeds of the illegal steroid business.

38. There are other members of the conspiracy, known and unknown to law enforcement, who participate in the activities described above. And each of the named members of the conspiracy participates in additional activities other than those outlined above.

REPRESENTATIVE ACTIONS BY THE MEMBERS OF THE CONSPIRACY

I. Controlled Purchases

A. Amgen Purchase of Testosterone and Trenbolone – August 2015

39. In July and August 2015, private investigators hired by Amgen became aware of the onyx_roid Instagram account and, following instructions posted by that account, emailed onyxsales2015@gmail.com, purporting to be a customer named Roy Rodriguez. They initially received an automatic reply from “Joe Blow” at onyxsales2015@gmail.com, with a price and product list for steroids (substantially similar to Exhibit 1). The investigator then received a direct email reply from the Big Dick Account asking for the investigator’s specific product order. After exchanging several emails with the Big Dick Account, the investigators ordered three

bottles of “Tren” (Trenbolone Acetate, 100 mg) and three bottles of “TestE” (Testosterone Enanthate, 250 mg)—both Schedule III controlled substances—for \$300.00. The investigator paid for the drugs as instructed via Western Union and received a USPS shipping number from the Big Dick Account. On August 8, 2015, the Amgen investigator received via USPS Priority Mail the “Onyx” test purchase products that they ordered through the email exchange. These products were sent to Amgen, which confirmed that the products contained counterfeit Onyx marks owned by Amgen.

B. HSI Purchase of Testosterone and Trenbolone – January 2016

40. On or about January 13, 2016, HSI agents, with the permission of Amgen, assumed the online identity of Roy Rodriguez used by the Amgen private investigators. HSI then used the email account to make another test purchase. Specifically:

- On January 31, 2016 an HSI undercover agent emailed the Big Dick account: “Hey brother, That last order was solid. If I put in for 3 more bottles of each are we still good at \$300?”
- The seller responded: “Yes send funds to Samantha Smith in Massachusetts.” The HSI agent replied: “OK I appreciate it. I’ll get the money together and send you my new address tomorrow.” The seller responded, “OK.”

41. On February 1, 2016, the HSI agent informed the seller via the Big Dick Account that the funds had been transferred and gave the seller an address for shipment.

42. On February 9, 2016, HSI received the requested package. The package contained three 250ml bottles of Testosterone and three 100ml bottles of Trenbolone. The products all bore the counterfeit Onyx marks—both the name and the logo were used. HSI agents preserved the six Onyx vials and sent them to the CBP Chicago Laboratory for substance analysis. The lab reported that the three vials of liquid labeled Testosterone enanthate were identified as testosterone enanthate in an oil-based solution (net weight 67.37 grams). The three vials of

liquid labeled trenbolone acetate were identified as trenbolone acetate in an oil-based solution (net weight 67.47 grams). Both testosterone enanthate and trenbolone acetate are anabolic steroids and Schedule III controlled substances

C. HSI Purchase of Testosterone and Trenbolone – August 2016

43. On August 7, 2016, an HSI undercover agent again assumed the identity of “Roy Rodriguez”—used at the start of the investigation by the Amgen private investigator and later by HSI agents as described above—and created a new email address incorporating the name Roy Rodriguez, in order to conduct an additional controlled buy. The HSI agent emailed the Big Dick Account and sought to place an order for “3 bottles of Test E and 3 bottles of Tenbolone.” The agent asked if the price was still \$300 and asked how to send the money to purchase the steroids.

44. Two days later, having received no response from the Big Dick Account, the agent inquired, “[W]hat up....can we do the order?” Within minutes, the Big Dick Account responded, instructing the agent to send the money to “Justin Smith in Massachusetts.” On August 10, 2016, the agent sent \$300 to “Justin Smith” as instructed, via Western Union. The agent then sent a confirmation email to the Big Dick Account and provided the recipient name (“Justin Smith”); sender name (“Jay Duarte”); Western Union MTCN (816-256-8785), and a shipping address where the steroids should be sent.

45. The next day, August 11, 2016, a package was sent from the Westminster Post Office to the HSI agent at the shipping address he provided. Postage was paid for with a USPS “Click-N-Ship” account in the name of “Clayton Wheeler” at 4 Willow St, Fitchburg, MA 01420. The account was created online from IP address 24.34.17.31, which is owned by Comcast. Comcast records establish that the subscriber assigned to that IP address on March 27,

2016, was Robert Medeiros at his prior residence (73 Pleasant St., Lunenburg MA). Moreover, the postage and labeling for the above-described package of steroids was created and paid for online from IP address 2601:189:c100:2775:bdc2:3ca:996a:6be6. Comcast records establish that the subscriber assigned to that IP address on August 11, 2016, was Robert Medeiros at the Medeiros Residence (i.e., his current residence, [REDACTED], in Gardner).

46. On August 19, 2016, HSI retrieved the requested package. The package included a return address of “Clayton Wheeler, 26 Willow Street, Fitchburg, MA 01420,” and the USPS tracking system showed that the package was shipped from Westminster, Massachusetts.

47. Medeiros has shipped hundreds of packages containing suspected steroids and related pharmaceuticals from his Click-N-Ship account. Click-N-Ship records for the period March 27, 2016 (the date it was created), through February 17, 2017 (the latest date for which records have been obtained) show that Medeiros purchased postage and labels for nearly 4,000 packages from IP addresses registered to the Medeiros Residence. For the period during which emails from the Big Dick Account have been obtained, agents have been able to confirm that many of these shipments made by Medeiros match the names of customers that placed orders and corresponded with the Big Dick Account.

48. Agents have observed Medeiros drop off packages containing suspected steroids on multiple occasions. For example, on August 9, 2016, agents observed Medeiros leave the Medeiros Residence at 4:00 p.m. and drive to the Westminster Post Office in a white Ford Explorer, bearing license plate number 143WR7 (the “White Ford Explorer”).⁴ Medeiros exited the White Ford Explorer and carried a white laundry basket full of packages into the Post Office

⁴ All times listed in this affidavit are approximate. The White Ford Explorer is registered to Robert Medeiros at the Medeiros Residence.

and exited a few minutes later with an empty basket. The Westminster Post Office confirmed that Medeiros shipped 28 Priority Mail express flat-rate envelopes to different individuals across the continental United States. All the envelopes contained the same return address: Clayton Wheeler, 26 Willow Street, Fitchburg MA (the same address used on the package of steroids ordered by the HSI agent), and the postage was paid for by Medeiros's Click-N-Ship account.

49. The next day, on August 10, 2016, at approximately 4:15 p.m., agents observed Medeiros exit the Medeiros Residence carrying a blue box. Medeiros drove to the Westminster Post Office, where he shipped 14 priority mail express flat-rate envelopes to different individuals across the continental United States. Again, all envelopes contained the same return address: Clayton Wheeler, 26 Willow Street, Fitchburg MA, and the postage was paid for by Medeiros's Click-N-Ship account. Based on touch, the envelopes appeared to contain small glass vials, and some contained small boxes that felt consistent with the packaging used to hold vials.

II. Trenbolone Acetone and Testosterone Shipped to Customer "YP"

50. On January 1, 2016, an individual who identified himself as "YP"⁵ emailed the Big Dick Account to order three "Tren Ace" and "2 test."⁶ About 8 minutes later, the seller instructed YP to send "265 to Madeline brewer in Massachusetts," meaning \$265 via Western Union remittance to be picked up by "Madeline Brewer." YP told the seller he would send the

⁵ "YP" are the initials of the full name provided by the customer.

⁶ This email, and the others in the exchange described herein, were obtained via a search warrant for the Big Dick Account. [REDACTED] initially requested "2 test cyp 2, tren ace and 2 anavar," but was informed by bigdick.bd723@gmail.com that "we are out of just about all orals till next week." [REDACTED] then requested "3 tren & 2 test for now," quickly clarifying that he wanted "Tren Ace."

money the next day, and repeated his order: “And just to make sure 3 tren Ace and 2 test cyp,” referring to Trenbolone Acetone and Testosterone Cypionate.

51. The next day, YP sent the Big Dick Account a Western Union MTCN (212-262-8726), confirmed that he sent the money to “Madeline Brewer,” and provided a shipping address in New York City.

52. On January 4, 2016, the Big Dick Account sent YP a USPS tracking number (9505-5133-5693-6004-0795-58), and YP replied that he would update the seller when he received the package.

53. That same day, postal workers at the Gardner, MA Post Office informed a U.S. Postal inspector that they intercepted a suspicious package. The U.S. Postal Inspector arranged to have the package sent to him for further inspection. The return address was “Kelley Rogers, 5 Pearl Hill Road, Fitchburg, MA 01420.” The Postal Inspector had previously spoken to employees at the Gardner Post Office about suspicious packages being sent with that return address—a residence that was vacant at the time. The Postal Inspector was unable to find any records suggesting a “Kelley Rogers” ever lived at that address. The sender of the package had mailed multiple similar packages on separate occasions from the Gardner Post Office and the Post Office located within the Staples store in Gardner, MA.

54. The Postal Inspector received the package intended for YP on January 6, 2016, and did not open it. As described below, the Postal Inspector later attempted to contact YP to inquire about the package.

55. On January 6, 2016, YP emailed the Big Dick Account and stated: “Hey bro I think something went wrong with the package.” The parties then exchanged numerous emails over the next few days discussing why the package was not delivered. Several of those emails

are reprinted in the table below.⁷ The subject for each of these emails was: “Something went wrong with the order.”

From	To	Date	Time	Message Body
YP	onyxsales2015 ⁸	1/7/2016	12:28 p.m.	Hey I ha order a couple of things from you guys on Saturday, you guys shipped it out on Monday and I was suppose to get it on Wednesday but the tracking number still says its in Massachusetts
bigdick.bd723	YP	1/7/2016	12:36 p.m.	Happens sometimes they probally just havent up dated it in there system
YP	bigdick.bd723	1/7/2016	12:41 p.m.	Na bro they called me fro over there a us post inspector don't know how he got my number either
bigdick.bd723	YP	1/7/2016	12:43 p.m.	Really wtf. Well dont go there ill reship your shit
YP	bigdick.bd723	1/7/2016	12:46 p.m.	Yea it's cool but I'm actually scared that they prob found out what it was and now they have my info because I find it weird that they got my number he left me a voice mail for me to call back in regards of the package has this happened before?
bigdick.bd723	YP	1/7/2016	12:57 p.m.	Let me do some research before i resend your package send me the trucking info. And im gonna call.also if i do resend just gimmie a different address

⁷ Unless otherwise indicated, the domain for email addresses in the table is gmail.com.

⁸ As described at ¶¶ 19-20 above, customers who email onyxsales2015@gmail.com then receive responses from the Big Dick Account and continue to correspond about orders with the Big Dick Account.

From	To	Date	Time	Message Body
YP	bigdick.bd723	1/7/2016	6:29 p.m.	Just one question do u think I should call the guy back and what do you think I should say? Really don't wanna get in trouble for this I called yesterday and he didn't pick up so I left a message and still hasn't called me back I'm just not sure of what could happen
bigdick.bd723	YP	1/8/2016	1:48 a.m.	Yea just call
YP	bigdick.bd723	1/8/2016	2:37 a.m.	But has this happened before thou? This is some serious shit bro lol
bigdick.bd723	YP	1/8/2016	2:46 a.m.	No .but it might not be anything thats why you gotta find out. Its illegal for anyone to open your mail.
YP	bigdick.bd723	1/8/2016	2:58 p.m.	Yea true but for a reason they found out my number I searched it up they are like cops for the post office so I'm guessing they either opened it or they put the package thru a scanner and noticed the little bottles I'm just curios of how they got my number
YP	bigdick.bd723	1/8/2016	3:24 p.m.	One more thing before I stop bothering with all this bs, what should I say if he asks me what's in the package? I mean I thought you guys were selling "shirts" lol
bigdick.bd723	YP	1/8/2016	3:37 a.m.	Just say you didnt order nothing you dont know what the hell That is. Donr mention us with the shirts
bigdick.bd723	YP	1/8/2016	3:51 a.m.	You know what could have happened maybe the bottle broke and it leaked oil and your package is soaked and they are telling you they cant deliver it. U can say it was prayer oil or something. Just dont go showing them the whole operation man..
bigdick.bd723	YP	1/8/2016	3:59 a.m.	If u play dum and dont act like you new what the package was you should be allset
YP	bigdick.bd723	1/8/2016	3:29 a.m.	Haha cool I'll just call to see what he wants and I'll just come up with something

From	To	Date	Time	Message Body
bigdick.bd723	YP	1/8/2016	4:03 a.m.	Just let me know what he says. Really if you just say you dont know what it is they cant do anything the second u say yea i ordered that then they got you.dont fall for cops tricks

56. On January 8, 2016, a US Postal Inspector contacted YP by phone. YP stated that the package contained a necklace he had ordered for his wife. The Postal Inspector asked Pena for permission to open the package, which remained sealed. YP gave his consent. The package contained: three 10ml vials of 100 mg/ml trenbolone acetate and two 10ml vials of 250 mg/ml of testosterone cypionate. The vials were packaged with “Onyx Pharmaceutical” marks, as depicted below.



57. USPS records establish that the package had been tracked online from a computer at IP address 216.195.18.3. This IP address is assigned to the Town of Shrewsbury Electric & Cable Operations (SELCO). At the time, SELCO had assigned that IP address to customer Katie Green at the Bauman/Green Residence ([REDACTED], Shrewsbury, MA 01545).

58. After YP received the call from the Postal Inspector, he continued his email exchange with the Big Dick Account.

From	To	Date	Time	Message Body
YP	bigdick.bd723	1/8/2016	8:23 a.m.	Bro he called me and the package was opened he said I ordered steroids but I had told him I don't know about that that the last thing I ordered was a "necklace" for my girl and he said he's just gonna destroy the package and I'm not getting the money or the package but he did say that he wanted to see what was in it that he got lucky he got a hold of mines because they were investigating were all these packages with addresses that don't exist had. He said it like that, that there was someone sending out packages all over and was putting a non exciting address. You gotta be careful cuz it seems that they're on to you or some shit
YP	bigdick.bd723	1/8/2016	8:38 a.m.	He said there was a small whole on the envelope that he could've see what it was onyx and that it was steroids I even told him I had high blood pressure that I didn't know shit and that I didn't order that but yea gotta be careful now
bigdick.bd723	YP	1/8/2016	8:40 a.m.	Hes a lieng fuck that stuff is tripple raped and sealed tight. He broke the law buy opeing your package
YP	bigdick.bd723	1/8/2016	8:47 a.m.	He said it was inside an envelope I kept on saying I don't know I never order that and he just wanted to tell me what was in it but he said he wasn't doing anything that I'm good and didn't ask anything about where I got it or anything just be careful brother they might be on to ya cuz of what he said that he's been seeing that someone is sending all these packages all over and putting a non exciting sender address

59. YP and the seller continued to discuss the package. The seller repeatedly asked YP for the telephone number of the Postal Inspector that contacted him. YP reported that he did

not have the number because he deleted the voicemail that contained it. YP said he recalled that the phone number began with “617.” On January 14 and 15, 2016, YP requested that the seller send “another batch” to the same last name/different first name at a different New York address. YP cautioned the seller to package the steroids in a USPS box (instead of an envelope) and stated that he believed the return address was a problem. The seller responded: “Thats not why it was opened it was canceled [sic] well. We got toby he bottom of it are girl was visting the same post office to much they grew suspicions and broke the law and opened it.” On January 22, 2016, the seller sent a USPS shipping number (9505-5112-4063-6021-0751-70). On January 26, 2016, YP confirmed receipt of the package.

III. Retrieval of Customer Payments by Green and her Sister

60. While Kathryn Green and Tyler Bauman primarily operate the logistical aspects of the business from their home, Green and her sister, [REDACTED], were also observed directly retrieving customer payments.

61. Specifically, on February 2, 2016 at approximately 7:30 a.m., HSI agents and Task Force Officers (TFOs) established surveillance on the Bauman/Green Residence, and observed the following:

- At 9:30 a.m., Kathryn Green exited the Bauman/Green Residence and got into a 2009 Mercedes E350 bearing license plate 6FN380, registered to Bauman at the Bauman/Green Residence (“Bauman’s Mercedes”).
- At 10:15 a.m., Kathryn Green arrived at [REDACTED] Fitchburg, MA and was observed picking up a female subsequently identified as [REDACTED], her twin sister.
- At 11:00 a.m., [REDACTED] entered a Walgreens pharmacy, located at 35 Central Street, Leominster, MA. [REDACTED] was observed using a Western Union Money Transfer computer.

- At 11:20 a.m., the women pulled into the parking lot of Hannaford Supermarket, located at 118 Lancaster Street, Leominster, MA. [REDACTED] was then observed making a transaction at the Western Union Money Transfer counter.
- At 11:35 a.m., the women pulled into a CVS Pharmacy parking lot located at 264 Mills Street, Leominster, MA. Both [REDACTED] and Kathryn Green exited Bauman's Mercedes and entered CVS Pharmacy. While inside the CVS Pharmacy, [REDACTED] was observed at the Money Gram Transfer counter with Kathryn Green standing behind her.
- At approximately 1:45 p.m., agents observed Kathryn Green dropping [REDACTED] off at the residence at [REDACTED], Fitchburg, MA and then leaving.

62. Based on my training and experience, the pattern of engaging in multiple transactions of a similar nature in a short span of time in different locations is a technique used to avoid detection by law enforcement. Further, as described above, the online advertisements and sale of the Onyx steroids direct customers to make payments using either Western Union or Money Gram, and customers were explicitly told both via Instagram and in emails that PayPal is not accepted because it leaves a "paper trail."

63. Critically, additional records in the case confirmed that the suspicious activity of Green and her sister on February 2, 2016 was directly related to the conspiracy. Specifically, on January 29, 2016, the Big Dick Account received an order for Testosterone Cypionate ("Test Cyp"), Boldenone Undecylenate, and Trenbolone Acetate ("Tren Ace"), and instructed the customer to send \$295 to "Tina Golds" in Massachusetts. Western Union records then showed that the customer named in the email sent \$295 to Tina Golds in Massachusetts, and that the funds were picked up by "Golds" on February 2, 2016, at 11:07 AM at the Walgreens Pharmacy at 35 Central Street, Leominster, Massachusetts—the same date, approximate time, and location that Green's sister was observed standing at the Western Union computer at Walgreens.

IV. Obtaining Raw Materials in International Shipments – Brian Petzke

64. Brian Petzke is one of the members of the conspiracy who receives the shipments of raw materials needed to make the counterfeit steroids. Petzke also shipped counterfeit “Onyx” pharmaceuticals to customers.

65. As described above, on or about January 13, 2016, HSI agents, using an online identity previously used by Amgen’s private investigators, ordered 6 bottles of injectable steroids by corresponding with the Big Dick Account. And on February 9, 2016, they received 6 vials of counterfeit Onyx steroids. The package had a return address from “Dave Pavone,” 70 Lowell Street, Peabody, MA 01960. The USPS tracking system indicated that the package shipped from Saugus, Massachusetts.

66. Also in February 2016, as part of an unrelated investigation, U.S. Postal Inspectors intercepted a USPS express package that was mailed from Wakefield, Massachusetts to Arizona. The recipient gave consent to open the package and it was found to contain steroids labeled “Onyx Pharmaceuticals.” The package also had a return address of “Dave Pavone” – this time supposedly at 8 Watters Street, Saugus MA 01906.

67. According to indices checks, there is no one with the name “Dave Pavone” at [REDACTED] in Saugus. The individual who resides there is Brian Petzke.

68. On April 21, 2016, HSI received information from USPS that an international package was inbound at the Saugus Post Office from Hong Kong to Brian Petzke at [REDACTED], Saugus MA. Based on my training and experience, I know that Hong Kong is a significant source of counterfeit pharmaceuticals. On April, 24, 2016, HSI agents inspected the package in an extended border search and found approximately 1.3 kilograms of a white powder. The package was not delivered to Petzke.

69. On April 27, 2016, the powder was sent for analysis to the CBP Laboratory, which found that the sample contained Testosterone propionate, an anabolic steroid and Schedule III controlled substance. Colloquially, the powder substance is “raw steroid.” This type of raw steroid is used to make the type of liquid injectable steroid that the investigation has uncovered being sold and advertised online as described above.

70. From the time the above-described package was seized, to September 23, 2016, Petzke received four more packages from Hong Kong. Each time, almost immediately after receiving the package at his home, Petzke met up with one of two women identified by law enforcement, and appeared to pass off the package. One of those woman, LM, is Petzke’s girlfriend. On October 3, 2016, LM herself received a package from Hong Kong.⁹ The package was seized and searched pursuant to the extended border search authority, which revealed that 1,042 grams of a white powdery substance concealed in a water filter. The substance was sent to the FDA, and preliminary results indicate that it is raw steroid. Shortly after the seizure, Petzke came to the post office in Saugus, inquiring about the whereabouts of LM’s package.

71. In addition, earlier in the conspiracy (between November 2013 and August 2015), Petzke sent money via Western Union to China five different times, approximately \$2,500 each time. In my training and experience, international sources, including China, Hong Kong, and Turkey, are often used to obtain illegal and/or counterfeit pharmaceutical drugs, including steroids.

72. Further, on February 3, 2016, in an email to a customer from the Big Dick Account, there was direct acknowledgement that the conspiracy obtains raw materials from

⁹ On September 6, 2016, L.M. signed for and received a package at the Saugus Post Office from Hong Kong.

China, when a delay in shipping steroids was blamed on the Chinese New Year: “Chines fucked us with there Chinese new year so a lot powders just sitting over there.”

73. As discussed below, the box from one of the packages that Petzke received from Hong Kong was later pulled from the trash outside the Goodwin Residence. In my training and experience, many counterfeit products that originate in China are sent to the United States through Hong Kong, due to a perception that the customs process is easier to navigate when done in this manner.

V. Obtaining Additional Supplies and Materials – the Sclafanis

74. Melissa and [REDACTED] Sclafani, a married couple residing in Gloucester, Massachusetts, also receive shipments of both international packages and domestic supplies used in the conspiracy. As noted above, in my training and experience, international sources, including China, Hong Kong, and Turkey, are often used to obtain illegal and/or counterfeit pharmaceutical drugs. The domestic supplies obtained by the Sclafanis appear to be the legal equipment and supplies needed for the manufacturing and packaging of the drugs.

75. Melissa Sclafani, [REDACTED] Sclafani, and Melissa Sclafani’s sister all receive mail at the Sclafani Residence. In January and February 2017, they received five international packages: two from China addressed to Melissa; one from China addressed to her sister; and two from Turkey (one addressed to Melissa, one addressed to [REDACTED]). Pursuant to my extended border search authority, on January 28, 2017, I opened one of the packages inbound from Turkey and discovered that it contained 12 boxes of clenbuterol, each containing 60 tablets, and five boxes containing Choriomon vials. Clenbuterol is described by Bauman in his e-book “Steroids – How To” as being useful in a steroid regime for “cutting,” which is reducing bloating and increasing muscle definition. Customers have ordered clenbuterol via the Big Dick Account. In

my training and experience, Choriomon, a fertility drug, is also used as part of a steroid regimen and/or by body builders using injectable drugs to enhance their physical appearance.

76. Between November 18, 2015 and March 10, 2017, Sclafani received 25 international packages from non-U.S. postal carriers (additional packages may have been received from carriers that partner with the USPS).

77. The Sclafanis have also sent money via Western Union to China on multiple occasions, as described below:

- On December 30, 2013, [REDACTED] Sclafani sent \$2,915 to China. Notably, Brian Petzke sent a Western Union to the same recipient in China on the same day.
- On April 14, 2016, Melissa Sclafani sent \$2,340 to China.
- On December 22, 2016, [REDACTED] Sclafani sent \$1,217 to China. Notably, Philip Goodwin had previously sent \$2,000 to the same recipient in China on January 23, 2016.
- On February 8, 2017, Melissa Sclafani sent \$1,963 to China.
- On February 23, 2017, [REDACTED] Sclafani sent \$1,400 to China.
- On March 3, 2017, Melissa Sclafani sent \$345 to China (to the same recipient in China as the February 23, 2017 remittance from [REDACTED] Sclafani).
- On March 12, 2017, [REDACTED] Sclafani sent \$2085 to China.

78. With regard to the domestic purchase of equipment and supplies, the Sclafanis make purchases from medical supply companies. For example, a January 2017 billing statement for a credit card in the name of [REDACTED] Sclafani showed purchases from Syringa Lab Supplies, LLC, an online seller of lab supplies, (including vials, filtration systems, and other laboratory

equipment), and Flow Lab Supply, Inc., an online seller of vials and the equipment and supplies needed to seal vials. Specifically, the credit card statement included the following transactions:

- January 7, 2017: \$584.93 to FlowLabSupply.com;
- January 7, 2017: \$47.94 to FlowLabSupply.com;
- January 17, 2017: \$423.80 to Syringa Labs via PayPal;
- January 23, 2017: \$497.54 to FlowLabSupply.com; and
- January 23, 2017: \$215.82 to Syringa Labs via PayPal.

79. In addition, as discussed further below, an examination of the trash outside the Goodwin Residence on January 26, 2017, revealed two empty packages mailed to Melissa Sclafani, at the Sclafani Residence, in January 2017 from a U.K.-based pharmaceutical supply company. The sticker on the box stated that it contained 10 ml clear vials, 24x47mm, and that the case included 1,224 units. The package label was dated January 9, 2017. A second package contained the same information, but was dated January 18, 2017.

VI. Assembly of the Steroids – Phillip Goodwin

80. The investigation has shown that Phillip Goodwin receives materials for the manufacture of steroids products from Melissa Sclafani and Petzke, assembles those materials into finished products, and provides the finished product to Medeiros for shipping. A summary of some observations of Goodwin's activity follows.

81. On January 26, 2017, law enforcement conducted an examination of the trash outside Goodwin's home. Only a portion of the trash was examined. Among the items observed and retained were:

- A package from Hong Kong addressed to Brian Petzke, [REDACTED], Saugus, MA,

- A package addressed to Melissa Sclafani, [REDACTED], Gloucester, MA from Zicis Group, dated January 9, 2017. A sticker on the box indicated that the contents included 1,224 10ml clear vials, 24x47mm. According to its website, Zicis Group LLC (UK) is a multinational firm that specializes in medial, pharmaceutical, and biological sourcing and customs brokerage services.
- Another package addressed to Melissa Sclafani, [REDACTED], Gloucester, MA from Zicis Group, this one dated January 18, 2017. A sticker on the box indicated that the contents included 1,224 10ml clear vials, 24x47mm.
- A mailing label dated January 18, 2017, that appears to be for the above-described January 18, 2017 package to Sclafani from Zicis Group.
- Rubber gloves.
- Three yellow and clear plastic filters, depicted below:



- A clear plastic bag from Jet Biofil labeled “Filter Upper Cups” that are to be used “for in vitro diagnostic medical devices.” According to its website, Jet Biofil is a Chinese company that develops, manufactures, and sells laboratory consumable products. The items depicted above appear to be consistent with those sold by Jet Biofil.

82. Law enforcement sought and obtained GPS tracking warrants for vehicles driven by Bauman, Green, Medeiros, Petzke, and another co-conspirator. The GPS trackers enabled law enforcement to observe several meetings involving Goodwin and other members of the conspiracy.

83. Goodwin works at a company called "[REDACTED]" According to its website, "[REDACTED]"
[REDACTED]
[REDACTED].” According to his profile on the social media site “LinkedIn,” Goodwin is an engineer at the company.

84. On January 18, 2017, law enforcement observed Medeiros drive his White Ford Explorer to the parking lot of [REDACTED] and park near Goodwin’s parked white Nissan Maxima.¹⁰ Medeiros appeared to retrieve something, and then reentered his car and drove away. He was in the parking lot for approximately three minutes.

85. On January 19, 2017, Goodwin received two packages from China, sent to his home address.

86. On January 23, 2017, law enforcement observed Goodwin driving from his home to the [REDACTED] parking lot, where he arrived at approximately 9:21 a.m. After he parked, he got out of the car while speaking on a cell phone. According to phone records, he was speaking to Melissa Sclafani. He took what appeared to be a lunch bag from the trunk and then carefully lowered the trunk hatch, leaving it unlatched. At no point did he appear to lock the car. He then entered his office building. At 10:41 a.m., Medeiros drove his White Ford Explorer into the [REDACTED] parking lot and parked near Goodwin’s car. He retrieved a package from the trunk of Goodwin’s car, put it in the trunk of his White Ford Explorer, closed both trunks, and drove away.

¹⁰ A white Nissan Maxima with license plate number [REDACTED] registered to Philip Goodwin, at the Goodwin Residence.

87. According to GPS data, Medeiros's White Ford Explorer visited the [REDACTED] parking lot nine times between December 19, 2016 and January 23, 2017.

88. On January 25, 2017, at 10:51 a.m., agents observed a black Cadillac Escalade registered to Kathryn Green in the [REDACTED] parking lot. GPS data showed it traveled there from the Bauman/Green Residence. The driver appeared to be Green, and the passenger appeared to be Bauman. Phone records show a call placed from Bauman to Goodwin around this time—specifically at 10:50 a.m. Law enforcement then saw Goodwin approach his Nissan Maxima from the direction of the [REDACTED] building. He retrieved a large, padded manila envelope with writing on it from the driver's side of his car. Goodwin then walked the envelope to the front passenger window of the Escalade and handed it to Bauman. At 10:55 a.m., the Escalade departed, and Goodwin returned to the [REDACTED] building.

89. From Dec 9, 2015 through January 6, 2017, Goodwin received 14 packages from China and Thailand non-U.S. postal carriers (additional packages may have been received from carriers that partner with the USPS). The receipt of these packages is consistent with his role in the conspiracy manufacturing steroids from imported components.

VII. "Wicked Tan"

90. In April 2016, Bauman purchased and reopened a tanning salon, Wicked Tan, LLC, located at 138 Dodge Street, Beverly, MA. Bauman and Goodwin are listed as the primary owners, and Melissa Sclafani is the secretary and controller of the Wicked Tan bank account. Bauman, Goodwin, and Sclafani, are all signers on the account, and all three have debit cards.

91. Although the business is open, and has actual employees, based on my training and experience and the facts outlined herein, I believe that the primary purpose of the business is

for the members of the conspiracy to pass, conceal, and launder funds for the conspiracy and to facilitate criminal enterprise through the purchase of supplies.

92. During an undercover visit to the tanning salon, I learned that the salon is offering unlimited monthly tanning for approximately the same price as tanning salons generally charge for one session. Further, during undercover surveillance of the tanning salon, HSI observed limited customers entering the salon, and inconsistent hours of operation. Significantly, while the tanning salon accepts credit/debit card payments, an analysis of the Wicked Tan bank account shows that less than 1% of the funds deposited into the account are card transactions—the rest is cash. In my training and experience, this itself is a sign that the money being brought into the business is not coming from legitimate customers.

93. Some of the cash deposited into the Wicked Tan bank account is used for legitimate business expenses, such as rent payments, payroll debits, paycheck tax withdrawals, and utility payments. Other purchases appear to be supplies for the conspiracy, including purchases from the same online retailers that the Sclafanis make purchases from—Syringia Lab Supplies and Flow Lab Supply Company (the online seller that specializes in vials and vial-related equipment such as stoppers and sealers). There are other expenses that appear to be Sclafani's personal expenses. Significantly, there are also a number of cash withdrawals—some that quickly follow cash deposits and are of approximately the same amount as the cash deposits, and are conducted at a different location from the deposits. Based on my training and experience, such activity is consistent with laundering illicit proceeds. Overall, the ending balances on the account are low: from March 1, 2016 to February 29, 2017, the account had a total of \$106,599.98 in deposits and \$102,621.01 in withdrawals, debits and checks.

94. An analysis of the activity from two months, June and July 2016, illustrates this pattern of activity. In June 2016, there were five cash deposits into the account at various locations, totaling, \$17,748.63. There were only five Square Inc. deposits (credit card transactions), totaling \$108.82. There were several gas station, fast food, and Home Depot debits, and \$2,500.00 spent at Toyota of Danvers. There were cash withdrawals (\$1,585.00), some of which were made on the same day as deposits in different locations (e.g., deposits in Shrewsbury, where the Bauman/Green Residence is, and withdrawals in Gloucester, where the Sclafani Residence is); two payroll payments; and a transfer to a checking account 1330523951, which is a joint account controlled by Melissa Sclafani and Goodwin. There were also two debit purchases totaling \$763.83 to Flow Lab Supply Company.

Date	Deposit	Branch	Date	Withdrawal	Branch
06/01/16	\$5000.00	Shrewsbury	06/01/16	\$320.00	Gloucester
06/09/16	\$2692.63	Gloucester			
06/21/16	\$4995.00	Shrewsbury	06/20/16	\$260.00	Gloucester
06/27/16	\$3090.00	Danvers	06/29/16	\$500.00	Gloucester
06/29/16	\$1971.00	Gloucester	06/29/16	\$505.00	Gloucester
Total:	\$17,748.63		Total:	\$1,585.00	

95. The activity in July 2017 followed a similar pattern: there were three cash deposits that were made into the account, totaling \$12,200.00, and six Square Inc. transactions totaling \$145.47. There were five cash withdrawals (totaling \$7,095.00), some of which were made on the same day as deposits, and two payroll payments (totaling \$2,247.59). There were

two debit purchases (totaling \$1,452.74) to Flow Lab Supply Company, \$225.50 to Syringa Lab Supplies via PayPal, and \$149.95 to Tex Lab Supply via PayPal.

Date	Deposit	Branch	Date	Withdrawal	Branch
			07/07/16	\$480.00	Gloucester
07/11/16	\$4000.00	Gloucester	07/11/16	\$1375.00	Beverly
07/18/16	\$3220.00	Gloucester	07/11/16	\$10.00	Beverly
07/26/16	\$5000.00	Shrewsbury	07/26/16	\$4500.00	Gloucester
			07/28/16	\$730.00	Gloucester
Total:	\$12,200.00		Total:	\$7095.00	

IIX. Contacts Between the Co-Conspirators

96. The members of the conspiracy contact each other frequently by phone (text and/or voice calls). Despite the fact that they all live in the same general area, they also send packages to each other. Further, the tracking devices that were installed for a period of time on some of the targets' automobiles showed in-person meetings. The vast majority of phone contacts between members of the conspiracy were via text messages as opposed to voice calls. Some of these phone contacts are summarized below.

- Between March 28, 2016, and October 13, 2016, there were 609 contacts between Kathryn Green and Goodwin.
- Between January 1, 2016 and March 3, 2017, there were 9,020 contacts between Melissa Sclafani and Goodwin.
- Between January 1, 2016 and March 3, 2017 there were 6,855 contacts between Bauman and Goodwin.
- Between March 7, 2016 and March 1, 2017, there were 2,755 contacts between Melissa Sclafani and Bauman.

- Between January 9, 2016 and October 3, 2016, there were 1,731 contacts between Petzke and Bauman.
- In a one month period, January 1, 2016 to February 13, 2016, there were 21 contacts between Melissa Sclafani and Petzke.
- Between February 28, 2016 and March 3, 2017, there were 3,131 contacts between Medeiros and Bauman.
- Between March 28, 2016 and March 3, 2017, there were 926 contacts between Medeiros and Goodwin.
- Between January 1, 2016 and March 3, 2017, there were 4,664 contacts between Petzke and Goodwin.

97. The members of the conspiracy also send packages to each other, despite all being in the same general geographic area:

- Medeiros used the Click 'N Ship account to send packages to Sclafani, Bauman, and Goodwin seven times.
- Melissa Sclafani mailed two priority packages to Tyler Bauman in early 2017.
- In March 2017, Bauman sent a package priority mail to Goodwin.

98. The members of the conspiracy meet at various times, often in a manner inconsistent with typical social or business interactions:

- Petzke's automobile was at the Goodwin Residence four times between December 18, 2016 and January 26, 2017.
- Medeiros was at Goodwin's work nine times between December 19, 2016 and January 23, 2017. During two of these occasions they were observed both being in the parking lot in short proximity to each other, without being there at the same time, in a manner that appeared deliberate.
- Bauman and Green met Goodwin at his work, in the parking lot, on January 25, 2016, as described above.
- Medeiros and the Escalade registered to Green were at the Whitney Fields Mall in Leominster at the same time on December 16, 2016, December 23, 2016, and January 20, 2017, and at the CVS on Mill Street in Leominster on December 30,

2016. Medeiros and the Mercedes registered to Bauman were at the CVS on Mill Street in Leominster on December 30, 2016, and on January 9, 2017.

99. The members of the conspiracy send money via Western Union to the same addresses in China, sometimes in very close proximity (e.g. multiple transmissions from different co-conspirators on the same day). In total, from November 7, 2013 through March 12, 2017, our named co-conspirators (with the exception of Medeiros), as well as Elizabeth Green and [REDACTED] Scfani, sent \$60,254 in remittances to China in their own names.

SUMMARY OF ACTIONS BY TARGETS

100. Bauman and Green run the logistical aspects of the operation from their home—handling the online marketing (including via Instagram) and arranging the sales of counterfeit Onyx steroids to customers on email (through the Big Dick Account and the sales accounts that forward into it). Bauman also maintains a public persona across social media that promotes the use of the product, but he publically denies any involvement in the sale or manufacturing of the Onyx pharmaceuticals. In addition, Bauman also has a history of receiving packages from international locations, including China and Turkey, and sending Western Union remittances to international locations, including 17 payments to China and payments to Turkey. Similarly, earlier in the conspiracy (2014 and 2015), Green was sending international Western Unions to China. And in early 2016, as described, Green and her sister retrieved domestic customer funds received by Western Union. Bauman and Green continue to receive packages internationally periodically, but at this point in the conspiracy, the focus of their activity appears to be managing the online activity.

101. Robert Medeiros sends a significant number of packages to customers. These include confirmed shipments of counterfeit Onyx steroids that can be traced both to purchases arranged through the Big Dick account and packages shipped using the Click 'N Ship account

run by Medeiros. Through both GPS trackers and in person surveillance, Medeiros has been traced to Goodwin's workplace, where he obtains packages from Goodwin.

102. Petzke and the Sclafanis are obtaining materials and supplies needed for the manufacturing of counterfeit steroids. These supplies were directly tied to Goodwin through an examination of the trash outside Goodwin's home. Petzke has also sent Onyx steroids directly to customers.

103. Goodwin is receiving supplies from Petzke and Melissa Sclafani, and passing packages to Medeiros.

104. The Wicked Tan business is co-owned/controlled by Bauman, Goodwin, and Sclafani. Based on an analysis of the activity at the business and the business accounts, it appears that the co-conspirators are using the business to pass, conceal, and launder funds for the conspiracy and to facilitate criminal enterprise through the purchase of supplies

SUMMARY OF USE OF TARGET LOCATIONS

██████████, Shrewbury, MA ("Bauman/Green Residence")

105. As discussed above, the sale of the counterfeit Onyx pharmaceuticals is arranged primarily through email: customers make inquiries to onyxsales2015@gmail.com and onyxpharma@gmail.com and both of those email addresses forward to bigdick.bd723@gmail.com (the Big Dick Account). Future correspondence is then made through the Big Dick Account. This account is repeatedly accessed by the IP address assigned to the Bauman/Green residence.

106. On March 18, 2011, a search warrant was conducted on Bauman's prior residence. Green was present. In the kitchen of the apartment, detectives found a can of corn with a false bottom, and a plastic bottle of water in the refrigerator that contained a "hide"

(separate compartment). While both were found empty, the presence of these items in the home suggests that the Bauman/Green Residence may contain items that the residents have taken measures to conceal from law enforcement in preparation for a potential search of the home. Bauman created one of his public Instagram pages (which show his face, and use the musclehead 320 persona) from the Bauman/Green residence. Bauman openly discusses his steroid use on these pages, and shows photographs that feature steroids. For instance, on August 31, 2015, he posted the below picture on the musclehead320 Instagram account, from an IP address that later accessed the Big Dick Account:



107. In my training and experience, the above photograph depicts a syringe, used for injectable drugs such as steroids. Based on other posts by Bauman, in the musclehead 320 account, I believe the powdered substance is protein powder.

108. Similarly, on November 26, 2016, Bauman posted a video containing the below image on his @musclehead320 account on Twitter:



109. This video, and image, shows Bauman basting a turkey with liquid steroids, and shows the turkey stuffed with both stuffing and vials of steroids (including one labeled “Onyx”). Another video posted to Twitter on March 8, 2017, shows Bauman going to his refrigerator and opening the freezer to reveal a number of boxes of pharmaceuticals associated with body building such as human growth hormone (this video also appears on Instagram). Based on the above, I expect that there will be counterfeit steroids, including those that bear the Onyx trademarks, in the Bauman/Green Residence.

110. In my training and experience, individuals coordinating and organizing the sale of illegal substances from their home will keep business records in their home, including records of customers, shipments, payments, and ledgers.

111. Bauman and Green have received mail to their home from other members of the conspiracy. They are also in frequent contact with other members of the conspiracy. In my training and experience, records of this mailing and/or other communications with co-conspirators will be found in the Bauman/Green Residence.

112. Further, Bauman and Green receive packages to their home from international locations that, in my training and experience, are frequent sources for illegal and counterfeit pharmaceuticals. Most recently, on April 6, 2017, I was notified by the USPS that there were two packages from Turkey being delivered to the Bauman/Green Residence.

████████████████████ Gardner, MA (“Medeiros Residence”)

113. On March 27, 2016, the “Click-N-Ship” account used to print the postage for mailing numerous packages, including the package sent to YP and one of the packages sent to an HSI undercover agent, was created from the IP address assigned to the Medeiros Residence.

114. On numerous occasions, Click-N-Ship postage was created for individual packages from IP addresses that also trace back to the Medeiros Residence.

115. Robert Medeiros was observed by law enforcement agents on August 9, 2016 and August 10, 2016 leaving his home with a large number of packages and mailing them from the post office.

116. Medeiros has arranged in person meetings with both Goodwin and Bauman/Green. There is direct evidence of his communications with Goodwin (between March 28, 2016 and March 3, 2017, Robert Medeiros had 926 phone contacts with Goodwin. In my training and experience, records and/or contents of communications with co-conspirators will be found in the Medeiros Residence.

117. In my training and experience, individuals conducting the shipping of illegal substances from their home will keep business records in their home, including records of customers, shipments, payments and ledgers. In my training and experience there will also be records of communications and contacts with co-conspirators.

██████████, Lynn MA ("Goodwin Residence")

118. The trash pull on January 23, 2017 demonstrated that both Petzke and Melissa Sclafani were receiving packages and delivering them to Goodwin. The Petzke package was an international package, from Hong Kong, which is significant because Petzke received raw powder steroid from Hong Kong, used to create liquid steroids. The Sclafani package appears to have contained vials, which would be used in the packaging of liquid steroids. In addition, the Wicked Tan business account, a business co-owned by Goodwin, shows multiple purchases of laboratory equipment. The other trash outside Goodwin's home also indicates the manufacturing of steroids, as shown above.

119. Goodwin also has a history of receiving international packages at the Goodwin Residence, including 14 packages from non-U.S. postal carriers between December 9, 2015 and January 6, 2017 from China and Thailand.

120. Goodwin has also received Amazon shipments to the Goodwin Residence of items used to manufacture steroids.

121. Goodwin was also observed driving from his home to his work, where Medeiros was observed picking up packages from his car. This suggests that the packages are being brought from his home.

122. In my training and experience, based on the information above, I believe there is probable cause that the Goodwin Residence will contain evidence of the manufacturing and packaging of liquid steroids; evidence of records of communications and contact with co-conspirators; and evidence of the operation of Wicked Tan and management of the funds in the business account.

123. In addition, there is direct evidence that Goodwin is communicating with and arranging logistical meetings/handoffs with other members of the conspiracy. In my training and experience, records and/or contents of communications with co-conspirators will be found in the Goodwin Residence.

██████████, Gloucester MA ("Sclafani Residence")

124. As detailed above, both ██████████ and Melissa Sclafani have ordered and paid for laboratory supplies that were sent to the Sclafani Residence. Most recently, a package was sent to Melissa Sclafani from Syringa Lab Supplies on March 21, 2017.

125. ██████████ Sclafani, Melissa Sclafani, and Melissa Sclafani's sister have all received international packages sent from China and Turkey to the Sclafani Residence. One of these packages, a package shipped to Melissa Sclafani from Turkey on January 30, 2017, contained steroids used in body building. In addition, both Melissa and ██████████ Sclafani have sent international Western Union payments.

126. As described, Melissa Sclafani is involved in the Wicked Tan salon with Bauman and Goodwin, a business that appears to be purchasing supplies for the conspiracy and serving as a mechanism to pass funds among members of the conspiracy.

127. In my training and experience, there is probable cause to believe that the Sclafani Residence will contain evidence of the purchase of supplies and equipment used for the manufacturing of counterfeit steroids; evidence of communications and contact with co-conspirators; and evidence of the operation of Wicked Tan and management of the funds in the business account.

128. There is direct evidence of Melissa Sclafani communicating with members of the conspiracy. For example, between March 7, 2016 and March 1, 2017, there were 2,755 contacts

between Melissa Sclafani and Bauman. In my training and experience, records and/or contents of communications with co-conspirators will be found in the Sclafani Residence.

██████████, Saugus, MA (the Petzke Residence) for a Cellular Phone

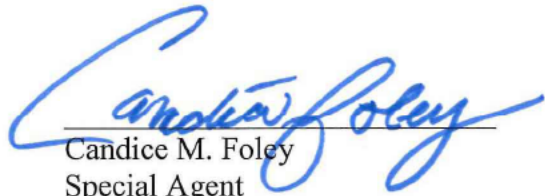
129. As described above, Petzke receives supplies for the conspiracy and provides them to Goodwin. Petzke is in frequent contact with Goodwin and Bauman. Specifically, between January 1, 2016 and March 3, 2017, Petzke had 4,664 contacts with Goodwin. Between January 9, 2016 and October 3, 2016, Petzke had 1,731 contacts with Bauman. Petzke also has contacts with Melissa Sclafani.

130. As a result, in my training and experience, records and/or contents of communications with co-conspirators will be found in the Petzke residence, including on his cellular phone.

CONCLUSION

131. Based on the information described above, I have probable cause to believe that Bauman, Green, Medeiros, Goodwin, Melissa Sclafani, [REDACTED] Sclafani and Petzke have conspired and continue to conspire to traffic in counterfeit drugs, in addition to other crimes, and that evidence of said criminal offenses will be found inside each Target Location.

Sworn to under the pains and penalties of perjury.


Candice M. Foley
Special Agent
Homeland Security Investigations

Subscribed and sworn to before me
on April 11, 2017

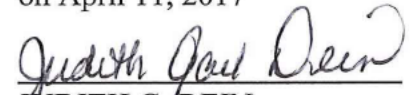

JUDITH G. DEIN
UNITED STATES MAGISTRATE JUDGE

EXHIBIT 1

On Jun 7, 2016 11:05 AM, "joe blow" <onyxsales2015@gmail.com> wrote:

MIN ORDER IS \$250!! We will not fill any orders under \$250. All product is shipped domestically for a flat rate of \$15 per order. We will only ship packages out mon-fri. Saturday is too difficult to ship as post offices close too early. Overnight shipping is no longer offered unavailable due to the volume of orders.

***** New Pharm Grade Orals, and Ancillary products*****

Organon 5000iu HCG with bac water	\$50.00
Balkan 10mg Dbol x 60 tabs	\$35.00
Balkan 10mg Winstrol x 60 tabs	\$45.00

Balkan 40mcg Clen x 60 tabs	\$45.00
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Vermodje Anavar 10mg x 100 tabs	\$95.00
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T3 25mcg x 100 tabs	\$60.00
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Pharm grade Arimidex 1mg x 28 tabs	\$90.00
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Pharm grade Cabergoline 1mg x 20 tabs	\$50.00
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***** New
Product *****

Test Deca Blend (200mg Test Enanthate 150mg Nandrolone Decanoate)	\$60.00
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Cut Stack (50mg Tren Ace, 50mg Test Prop, 50mg Masteron)	\$60.00
Nandrolone Phenylpropionate 100mg/ml	\$40.00

We will offer discounts for orders over 3k

***** Oils *****	
Testosterone Cypionate 250mg/ml	\$45.00
Testosterone Enanthate 250mg/ml	\$45.00
Testosterone Propionate 100mg/ml	\$40.00
Sustanon 250mg/ml	\$45.00

Trenbolone Acetate 100mg/ml	\$50.00
Tren Blend (100mg Tren Enanthate 50mg Tren Acetate)	\$50.00
Boldenone Undecylenate 250mg/ml	\$45.00
Nandrolone Decanoate 250mg/ml	\$50.00
Drostanolone Propionate 100mg/ml	\$50.00
Andropen 400mg/ml (5 test esters)	\$45.00
Trenbolone Enanthate 150 mg/ml	\$50.00

***** Orals *****

All in stock

(All tabs come in sealed bottles. 50-50mg tabs per bottle)

Anadrol 50mg	\$60.00
Anavar 50mg	\$90.00
Dbol 50mg	\$60.00
Winstrol 50 mg	\$65.00
Turinabol 50mg	\$70.00
Clomid 50mg	\$55.00
Nolvadex 50mg	\$55.00

DO NOT SEND MULTIPLE EMAILS, be patient we will respond within a few hours. Multiple emails regarding the same matter will be answered last! Please DO NOT ASK FOR CYCLE ADVICE, we will not respond to those types of questions. We accept money gram or western union, DO NOT send funds from online. Everytime money is sent online through western union and money gram there is always a problem and the money needs to be resent from a physical location.

To ask a question write "QUESTION" in the subject line.

To place an order reply to onyxsales2015@gmail.com

with "ORDER" in the subject line, include what you want to order. We will then provide you with a name and state to send the funds to(This is all the info you need). Once money is transferred send an email with "MTCN SENT" in the subject line. In the email include:

1. Amount sent including shipping. DO NOT INCLUDE WESTERN UNION FEES.
2. Senders name and Receivers name.
3. Order
4. Shipping address DOUBLE CHECK THIS WE ARE NOT SHIPPING CANDIES.
5. MTCN or Moneygram Reference number

Orders will be shipped within 24 upon receiving payment. Tracking will then be sent. Thank you for choosing Onyx Pharmaceuticals.

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DO NOT SEND WESTERN UNION OR MONEY GRAM FROM ONLINE!!!!!!!!!! Every time money is sent online it needs to be resent from a western union or money gram location. This will slow your order down by at least a day or too.

Once money is transferred send an email with "MTCN SENT" in the subject line. In the email include:

1. Amount sent including shipping. DO NOT INCLUDE WESTERN UNION FEES.
2. Senders name and Receivers name.
3. Order
4. Shipping address DOUBLE CHECK THIS WE ARE NOT SHIPPING CANDIES.
5. MTCN or Moneygram reference number

Orders will be shipped within 24 upon receiving payment. Tracking will then be sent.

We will do our best to provide you with the best possible service at the most competitive prices for the highest quality products.

Email us if you have any questions or concerns, your feedback is appreciated.

Thank you,
Onyx Pharmaceuticals